Uintah Basin Electronic Telecommunications d/b/a UBET Wireless 3843 South Highway 40 P.O. Box 157 Roosevelt, Utah 84066

Marlene H. Dortch, Secretary Office of the Secretary Federal Communications Commission 445 – 12th Street, S.W. Washington, D.C. 20554

> Re: WT Docket No. 01-309 HAC Digital Wireless Telephones

Sixth Semi-Annual Report

Dear Ms. Dortch:

The Filer, Uintah Basin Electronic Telecommunications d/b/a UBET Wireless, is the licensee of Cellular Radiotelephone Service Station KNKN236; and of Broadband Personal Communications Service ("PCS") Stations KNLG530, WPQZ730, WPQZ731 and WPSZ758. This report is submitted pursuant to the requirements of Paragraph Nos. 89 – 91 of the Commission's Report and Order (WT Docket No. 01-309), FCC 03-168, released August 14, 2003 ("R&O").

By way of background information, the Filer is a small, Tier III Commercial Mobile Radio Service licensee, as defined in the Commission's E-911 Order to Stay, FCC 02-210, released July 26, 2002. The Filer provides Frequency Block B cellular service to the B2 Segment of the Utah 5 – Carbon RSA; and Broadband PCS service within the Rock Springs, Wyoming, Grand Junction, Colorado, Denver, Colorado and Salt Lake City – Ogden, Utah BTAs. The digital portion of the Filer's cellular system employs the Time Division Multiple Access ("TDMA") air interface; and the Filer's Broadband PCS systems employ the Code Division Multiple Access ("CDMA") air interface. The Filer is in the process of overbuilding its cellular TDMA facilities with replacement CDMA facilities, although none of the cellular CDMA facilities are being placed into commercial service to date. As a result of the overbuild, TDMA-only units are no longer being activated on the cellular system. Instead, all current activations are tri-mode handsets (i.e., analog cellular, CDMA Broadband PCS, and CDMA cellular).

The Filer currently markets approximately eighteen (18) digital wireless telephones. Of these, a total of six (6), the Motorola Models V262, V266, V323, V710, W315 and RazrV3c, meet a U3 (or M3) rating under ANSI Standard C63.19. Upon information and belief, none of these six models meets a U3T (or M3T) rating under ANSI Standard C63.19.

To achieve compliance with the Hearing Aid Compatibility ("HAC") requirements of the <u>R&O</u>, the Filer has been and remains literally at the mercy of the handset manufacturers to develop and market HAC-compliant digital wireless handsets. As a small, Tier III wireless carrier, the Filer has had, and will have, no influence over the product development and distribution decisions of wireless handset manufacturers; and, accordingly, relies on the manufacturers to develop HAC-compliant digital wireless handsets for use on the Filer's systems.

Given the foregoing, the information requested by the Commission is identified as follows:

- Item 1 -- Digital Wireless Phones Tested: The Filer has not tested any digital wireless telephones for HAC compliance. All testing has been done (and, for future models marketed for the systems, will be done) by the handset manufacturers.
 - Item 2 -- Laboratory Used: None. See Response to Item 1.
- Item 3 -- Test Results For Each Phone Tested: Not applicable. See Response to Item 1.
- Item 4 -- Identification Of Compliant Phone Models and Ratings According To ANSI C63.19: Six digital wireless handset models marketed by the Filer, the Motorola Models V262, V266, V323, V710, W315 and RazrV3c, meet a U3 (or M3) rating under ANSI Standard C63.19. Upon information and belief, none of these models meets a U3T (or M3T) rating under ANSI Standard C63.19.
- Item 5 -- Report On The Status Of Product Labeling: None. Product labeling is presently being handled by the handset manufacturer, Motorola. It is anticipated that all product labeling for future HAC-compliant handset models activated on the system will be handled by the handset manufacturers. To date, the manufacturer-supplied packaging for all of the compliant digital wireless handset models marketed by the Filer indicates that the units are hearing aid compatible.
- Item 6 -- Report On Outreach Efforts: The Filer's Customer Service personnel are aware of the HAC-compliant digital wireless handset issue and have been trained to respond to customer inquiries regarding HAC-compliant phones. Both hearing-impaired and non-hearing-impaired customers are permitted to test the phones in the retail store. In addition, the Filer has a policy which allows customers (hearing-impaired or otherwise) to test handsets and service without commitment for up to two weeks. If the customer is not satisfied, the customer may return the handset free of charge (assuming that it has not been damaged) at the end of the two-week trial period.
- Item 7 -- Information Related To Retail Availability of Compliant Phones: See Response Item 4.

Item 8 -- Information Related To Incorporating Hearing Aid Compatibility Features Into Newer Models Of Digital Wireless Phones: The incorporation of HAC features into newer models of digital wireless telephones will be accomplished by the handset manufacturers.

Item 9 -- Any Activities Related To ANSI C63.19 Or Other Standards Work Intended To Promote Compliance With The Requirements Of The Commission's Report and Order: None.

Item 10 -- Total Numbers Of Compliant And Non-Compliant Phone Models Offered As Of The Date Of This Report: See page 1 of this Report and the Response to Item 4. The Filer currently markets approximately eighteen (18) digital wireless handset models, of which six (6) meet a U3 (or M3) rating under ANSI Standard C63.19.

Item 11 -- Any Ongoing Efforts For Interoperability Testing With Hearing Aid Devices: Interoperability testing will be performed by the handset manufacturers.

Very truly yours,

Uintah Basin Electronic Telecommunications d/b/a UBET Wireless

Dated: November 15, 2006

Jeff Goodrich
Chief Operating Officer

In accordance with Rule Section 1.12, please refer any inquiries or correspondence to:

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